

Exhibit 1

From: [Ryan, Monica \(USAAZ\)](#)
To: jilamm@cyberlawaz.com; [Jeff Jacobson](#)
Cc: [Walters, Nathaniel \(USAAZ\)](#)
Subject: Expert notices
Date: Friday, January 10, 2025 4:54:47 PM

Jason and Jeff:

On Monday, the government plans to file notices with the Court of our intent to call the following expert witnesses. Depending on how the case comes in, we may reserve an expert to testify on rebuttal, or we may decide that we don't need to call them at all. Regarding the required discovery under Rule 16, we provide the following information:

1. **Douglas J. Halepaska, Jr. (FBI Lab forensic examiner).** You have his report of his forensic examination of the firearms, shell casing, bullet, and ammunition in this case, and his CV (see Bates 01-1221 through 1225, disclosed on March 13, 2024; and Bates 04-1993, disclosed on July 23, 2024, respectively).
2. **Kevin D. Horn, MD (Medical Examiner).** You have his report (see Bates 01-0831 through 0838, disclosed on March 13, 2024). We have requested his CV and will provide it to you as soon as we have it in our possession.
3. **Hoang Lim, DO and Joseph F. Sucher, MD (Surgeons at Deer Valley Medical Center).** You have the medical records from the treatment of SA Bauer on 08/17/23 (see Bates 01-0177 through 0830, disclosed on March 13, 2024). Our intention is to file a notice with the Court that the surgeons are going to be called to testify about the medical treatment they provided to SA Bauer, but because the specialized education, training, and experience of trauma surgeons are outside the common knowledge of the jury, we are noticing them as experts in an abundance of caution. We have requested their CVs and will provide them as soon as we have them in our possession.
4. **Emergency Response Expert.** We are working to identify a witness who will testify about the emergency response procedures of the Phoenix Fire Department and Daisy Mountain Rescue, after reviewing the records of the emergency response on 08/17/23 and the report written by Anthony Cole, including the documents upon which he relied (that you disclosed to us on December 16 and 17, 2024). The witness we previously contacted notified us today that he is not available to testify at trial, so we intend to seek an extension of time from the Court to file the notice with respect to this witness only. Please let us know whether or not you object to such an extension.

Thank you,
Monica

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